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March 8, 2000

Federal Aviation Administration
800 Independence Avenue
Washington, DC 20591

Attention: Mr. Anthony Fazio, ARM-1

Subject: ARAC Submittals – Propeller NPRM and Advisory Circulars

Reference: ARAC Tasking, Federal Register dated August 17, 1994

Dear Tony,

In accordance with reference tasking the ARAC Transport Airplane and Engine Issues Group is pleased to submit the following documents for formal economic and legal review.

FAR Part 35 – Propellers – NPRM
AC 35-1 Propeller Type Certificate Handbook
AC 35-23 Guidance Material for 14 CFR 35.23 Propeller Control System
AC 35-37 Guidance Material for 14 CFR 35.37 Fatigue Limits and Evaluation
AC 20-66 Vibration and Fatigue Evaluation of Aircraft Propellers
AC 35-15 Guidance Material for 35.15 Safety Analysis

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These documents have been prepared by the Propeller Task Group under the Engine Harmonization Working Group. During TAEIG discussions with the group and the FAA it was agreed that the following areas in the NPRM preamble should include additional language that would clarify the working group's intent. These are:

1. Clarify that this rulemaking package provides for a level of integrity consistent with that set forth in Part 23 or 25.
2. Clarify that engine structural failures, such as a failure of a gearbox case, are not to be considered during the propeller system safety analysis or propeller controls requirements. However, propeller governors or other components that control

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propeller functions and are certified with the engine or aircraft, who's failure would produce hazardous or major propeller effects listed in proposed FAR 35.15 (g), would be subject to the requirements of FAR 35.15(a)(3) and (a)(4) so that a uniform minimum standard would exist for propeller controls.

3. Clarify that the propeller vibration and fatigue requirements do not add extra burden for Part 23 aircraft.
4. Clarify that the new 4-pound bird requirement only addresses the propeller.

The FAA agreed to address the above during the legal review. Please feel free to contact us if additional information is needed.

Sincerely yours,



C. R. Bolt
Assistant Chair, TAEIG

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*Letter only